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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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UNITED STATES OF AMERICA

: Hon. Edward S. Kiel

v.

: Mag. No. 20-15129

: **Criminal Complaint**

MADS MOLGAARD

:

I, Special Agent Joseph Shapiro, being duly sworn, state that the following is true and correct to the best of my knowledge and belief:

**SEE ATTACHMENT A**

I further state that I am a Special Agent with the United States Department of Homeland Security, and that this complaint is based on the following facts:

**SEE ATTACHMENT B**

continued on the attached pages and made a part hereof.

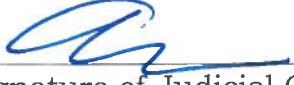
  
\_\_\_\_\_  
Special Agent, Joseph Shapiro  
United States Department of Homeland Security

Sworn to before me and subscribed in my presence,

March 12, 2020  
Date

at 4:30pm Essex County, New Jersey  
County and State

HONORABLE EDWARD S. KIEL  
UNITED STATES MAGISTRATE JUDGE

  
\_\_\_\_\_  
Signature of Judicial Officer

**ATTACHMENT A**

**COUNT ONE**

(Conspiracy to Commit Bank Fraud)

From at least as early as in or around February 2020 through at least on or about March 10, 2020, in the District of New Jersey and elsewhere, the defendant,

MADS MOLGAARD,

knowingly and intentionally conspired and agreed with others to commit bank fraud, specifically to execute and attempt to execute a scheme and artifice to defraud a financial institution, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and to open deposit accounts at such financial institution, by means of material false or fraudulent pretenses, representations, or promises, with the intent to deceive such financial institution, contrary to Title 18, United States Code, Section 1344.

In violation of Title 18, United States Code, Section 1349.

**ATTACHMENT B**

My name is Joseph Shapiro and I am a Special Agent employed by the Department of Homeland Security (DHS), Immigration and Customs Enforcement (ICE), Homeland Security Investigations (HSI). I am currently assigned to the Newark Airport Response Group. I have training and experience in conducting criminal investigations for violations of federal and state laws including, but not limited to alien smuggling, document/benefit fraud, narcotics smuggling, child exploitation, weapons trafficking, complex financial investigations and organized criminal activity. Prior to becoming a Special Agent with HSI, I was employed as a Special Agent with the United States Secret Service (USSS). I also previously served in the United States Coast Guard (USCG) from 2006 to 2014, serving as a Maritime Enforcement Specialist trained to enforce federal laws pertaining to migrant and drug interdiction.

**Probable Cause**

1. Between in or around February 2020 and on or about March 10, 2020, defendant Mads Molgaard ("MOLGAARD") conspired with several unidentified individuals ("UIs") located in Kenya to execute a scheme in which the conspirators, including MOLGAARD, opened bank accounts in the United States by using forged passport documents in order to launder money on behalf of the UIs.

2. On or about March 10, 2020, law enforcement detained MOLGAARD, who was subject to an arrest warrant in California, attempting to board a flight at Newark Liberty International Airport in Newark, New Jersey. Law enforcement conducted a lawful search of MOLGAARD's possessions, and discovered multiple forged passports.

3. For example, law enforcement recovered a doctored United Kingdom passport (the "PASSPORT") containing MOLGAARD's picture and another individual's name and which, according to customs records, belonged to a citizen of the United Kingdom and not MOLGAARD.

4. After the airport search, and after being advised of his Miranda rights, MOLGAARD admitted to law enforcement that he had used the PASSPORT to unlawfully open bank accounts (the "FRAUDULENT ACCOUNTS") at three banks (the "DEFRAUDED BANKS"). The DEFRAUDED BANKS are financial institutions, the deposits of which are insured by the Federal Deposit Insurance Corporation. After obtaining this information from MOLDAARD, law enforcement confirmed the existence of the FRAUDULENT ACCOUNTS at the DEFRAUDED BANKS, which were, in fact, opened under the name on the PASSPORT.

5. Based on its investigation to date, law enforcement has also discovered that the UIs sent the PASSPORT and several checks to MOLGAARD in New Jersey. MOLGAARD retrieved those items in New Jersey, travelled to Philadelphia, and opened the FRAUDULENT ACCOUNTS. Then, MOLGAARD deposited the UI's checks into those accounts and transferred those funds into shell companies that MOLGAARD had established in New Jersey. Based on this and my training and experience, the UIs and MOLGAARD opened the FRAUDULENT ACCOUNTS and executed these structured transactions in order to conceal the source of the UIs funds.